

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
(Northern Division)**

MICHAEL A. SCOTT, <i>et al.</i>	)	
	)	
Plaintiffs,	)	
v.	)	Civil Action No. 1:21-cv-00034-SAG
	)	
BALTIMORE COUNTY, MD,	)	
	)	
Defendant.	)	
_____	)	

**DEFENDANT’S MOTION FOR SUMMARY JUDGMENT**

Defendant Baltimore County, MD, by and through its undersigned counsel and pursuant to Federal Rule of Civil Procedure 56, submits the following Memorandum of Law in Support of Defendant’s Motion for Summary Judgment. Based on the following points and authorities, Defendant respectfully requests the dismissal of all claims in their entirety with prejudice.

**WHEREFORE**, Defendant respectfully requests that this Court grant its Motion for Summary Judgment, dismiss Plaintiffs’ Complaint with prejudice, and provide for any other relief the Court deems appropriate. A proposed Order follows.

Dated: October 17, 2022.

Respectfully submitted,

/s/ Kraig B. Long

Kraig B. Long (Fed. Bar No. 25747)  
Jeffrey T. Johnson (Fed. Bar No. 19876)  
Nelson Mullins Riley & Scarborough, LLP  
100 S. Charles Street, Suite 1600  
Baltimore, MD 21201  
Tel: 443-392-9460  
Fax: 443-392-9499  
[Kraig.Long@nelsonmullins.com](mailto:Kraig.Long@nelsonmullins.com)  
[Jeffrey.Johnson@nelsonmullins.com](mailto:Jeffrey.Johnson@nelsonmullins.com)

/s/ Jennifer R. Frankovich

Jennifer R. Frankovich, Fed. Bar#26052  
Veronica N. Love, Fed. Bar#21531  
Baltimore County Office of Law  
400 Washington Ave, 2<sup>nd</sup> Floor  
Towson, MD 2104  
Tel: 410-887-4420  
Fax: 410-296-0931  
[JFrankovich@BaltimoreCountyMD.gov](mailto:JFrankovich@BaltimoreCountyMD.gov)  
[VLove@BaltimoreCountyMD.gov](mailto:VLove@BaltimoreCountyMD.gov)

***Counsel for Defendant***

**CERTIFICATE OF SERVICE**

I HEREBY certify that on the 17<sup>th</sup> day of October, 2022, a copy of the foregoing **Defendant's Motion for Summary Judgment, Memorandum of Law, and proposed Order** was filed and served on all counsel of record via the Court's CM-ECF filing system.

Bradford W. Warbasse  
Bradford Warbasse Attorney at Law  
P.O. Box 1284  
Brooklandville, Md 21022  
443-862-0062  
[Warbasselaw@gmail.com](mailto:Warbasselaw@gmail.com)

Stephen J. Springer  
Law Offices of Stephen J Springer  
1901 Walnut Street, Suite 4A  
Philadelphia, Pa 19103  
Tel: 215-732-8229  
Fax: 215-732-8232  
[SpringerLaw@MSN.com](mailto:SpringerLaw@MSN.com)

***Counsel for Plaintiffs***

Howard Benjamin Hoffman  
Jordan Song En Liew  
Howard B Hoffman Attorney at Law  
600 Jefferson Plaza Suite 204  
Rockville, MD 20852  
Tel: 301-251-3752  
Fax: 301-251-3753  
[HHoffman@hoholaw.com](mailto:HHoffman@hoholaw.com)  
[JLiew@hoholaw.com](mailto:JLiew@hoholaw.com)

/s/ Craig B. Long

Kraig B. Long, Esquire